

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**IN RE: LONNIE P WALKER  
ARETHA R WALKER**

**CASE NO.: 14-02150-NPO  
CHAPTER 13**

**OBJECTION TO MOTION FOR ENTRY OF DISCHARGE**

COMES NOW, U.S. Bank Trust National Association as Trustee of Chalet Series III Trust ("Creditor") by and through counsel, and files this objection to Motion for Entry of Discharge (Dk# 70) filed November 30, 2018 by the Debtors, and for cause would show as follows:

1.

Creditor is a secured creditor in the above entitled case by virtue of its holding a Note secured by a Deed of Trust affecting property of the Debtors is located at 1060 OLD HIGHWAY 27 RD #1 CRYSTAL SPRINGS, MS 39059. The Note and Deed of Trust is payable in monthly installments and the property affected is the home of the Debtors.

2.

Counsel for Creditor files this Response in regard to the mortgage that was to be paid direct in the plan and the post petition default in the amount of \$31,613.70. For this reason, the Debtors have failed to make all payments under the plan.

3.

For the above reason and *In Re: Kessler*, 2016 WL 3667575 (5<sup>th</sup> Cir. July 8, 2016), and unless the Debtors can show all the direct post petition mortgage payments have been made, this court should deny the Motion for Entry of Discharge.

4.

For the foregoing reasons, Creditor objects to the Motion for Entry of Discharge.

WHEREFORE, CREDITOR PRAYS that the Motion for Entry of Discharge herein be denied by the court.

The undersigned files this pleading upon information and belief provided by Creditor.

Dean Morris, LLC  
1820 Avenue of America  
Monroe, LA 71201  
(318) 330-9020

**/s/ Elizabeth Crowell**  
Elizabeth Crowell (Bar# 103676)  
Attorney for Creditor  
elizabeth.crowell@ms.creditorlawyers.com

**CERTIFICATE OF SERVICE**

I, Elizabeth Crowell, hereby certify that I have notified all interested parties of the Objection to Motion for Entry of Discharge filed by Creditor, who are listed as follows:

Lonnie P Walker  
Aretha R Walker  
1060 OLD HIGHWAY 27 RD #1  
CRYSTAL SPRINGS, MS 39059

Robert Rex McRaney, Jr.  
Attorney at Law  
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Harold J. Barkley T1, Jr.  
Trustee  
HJB@HBarkley13.com

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USTPRegion05.JA.ECF@usdoj.gov

by electronic transmission or by mailing a copy of the Objection to Motion for Entry of Discharge filed herein by United States Mail, first class, postage prepaid and properly addressed, all on this the 19<sup>th</sup> day of December 2018.

Dean Morris, LLC  
1820 Avenue of America  
Monroe, LA 71201  
(318) 330-9020

**/s/ Elizabeth Crowell**  
Elizabeth Crowell (Bar# 103676)  
Attorney for Creditor  
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